

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
)	
JOANN INC., <i>et al.</i> , ¹)	Case No. 25-10068 (CTG)
)	
Debtors.)	(Jointly Administered)
)	
)	Re: Docket No. 1317

**CERTIFICATION OF COUNSEL REGARDING DEBTORS’
NINTH OMNIBUS OBJECTION TO CERTAIN CLAIMS (SUBSTANTIVE)
(Reduced and Reclassified Claims, Reclassified Claims
Substantive Duplicate Claims, Cross-Debtor Duplicate Claims)**

The undersigned counsel to the Plan Administrator in the above-captioned cases hereby certifies as follows:

1. On June 30, 2025, the *Debtors’ Ninth Omnibus Objection to Certain Claims (Substantive) (Reclassified Claims)* [Docket No. 1317] (the “Objection”) was filed with the United States Bankruptcy Court for the District of Delaware (the “Court”). Attached thereto as Exhibit A was a proposed form of order granting the relief requested in the Objection (the “Proposed Order”).
2. Pursuant to the notice of the Objection, the deadline to file a response to the Objection was July 21, 2025 at 4:00 p.m. (prevailing Eastern Time) (the “Response Deadline”).
3. Prior to the Response Deadline, the Plan Administrator received an informal response to the Objection and Proposed Order from Enchante Accessories Inc. (“Enchante”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

4. To resolve Enchante's informal response, the Plan Administrator and counsel to Enchante agreed to a revised Proposed Order, a copy of which is attached hereto as **Exhibit A** (the "**Revised Proposed Order**").

5. A redline comparing the Revised Proposed Order against the Proposed Order is attached hereto as **Exhibit B**.

6. The Plan Administrator respectfully requests that the Court enter the Revised Proposed Order at its earliest convenience.

Dated: September 11, 2025
Wilmington, Delaware

/s/ Michael E. Fitzpatrick

COLE SCHOTZ P.C.

Patrick J. Reilley (No. 4451)

Stacy L. Newman (No. 5044)

Jack M. Dougherty (No. 6784)

Michael E. Fitzpatrick (No. 6797)

500 Delaware Avenue, Suite 600

Wilmington, Delaware 19801

Telephone: (302) 652-3131

Facsimile: (302) 652-3117

Email: preilley@coleschotz.com

snewman@coleschotz.com

jdougherty@coleschotz.com

mfitzpatrick@coleschotz.com

- and -

HAHN LOESER & PARKS LLP

Christopher B. Wick (admitted *pro hac vice*)

200 Public Square, Suite 2800

Cleveland, Ohio 44114

Telephone: (216) 274-2489

Facsimile: (216) 241-2824

Email: cwick@hahnlaw.com

Co-Counsel to the Plan Administrator